REMARKS

Claims 1-3, 6, and 7 are pending in the application. Claims 1-3 and 6 are withdrawn from consideration as being directed toward a non-elected invention. In the final Office Action of November 3, 2006, the Examiner rejected claim 7 under 35 U.S.C. §102(b) as allegedly being anticipated by *Chumg, et al ("Chung.")* Applicants respectfully traverse the rejection and address the Examiner's disposition below.

Referring to Applicants' Figure 1 as an illustrative example, Applicants' independent claim 7, as amended, claims a method of manufacturing an image pickup device having at least one insulated gate field effect transistor 30 in an output circuit of the image pickup device and that is formed in a substrate 11. The method comprises forming, prior to forming the insulated gate field effect transistor 30, a first diffusion layer 12 of a first conduction type (*e.g.*, p+) in the substrate 11 beneath where the insulated gate field effect transistor 30 is to be formed. The first diffusion layer 12 is formed at a position deeper than a region where a source region 33 and a drain region 34 of the insulated gate field effect transistor 30 are to be formed. The first diffusion layer 12 underlies an entire area of the source region 33 and an entire area of the drain region 34 and is entirely separated from the source region 33 and the drain region 34.

The method further comprises forming, prior to forming the insulated gate field effect transistor 30, a second diffusion layer 13 of the first conduction type having a higher concentration (*e.g.*, p++) than the first diffusion layer 12 in the substrate 11 at a position deeper than the first diffusion layer 12. The second diffusion layer 13 is entirely separated from the first diffusion layer 12 by an intervening layer having a conduction type that is different than the first conduction type.

This is clearly unlike *Chung*, which fails to disclose or suggest Applicants' claimed second diffusion layer that is entirely separated from a first diffusion layer by an intervening layer having a different conduction type. Referring to *Chung* Figure 5D, *Chung* discloses a first diffusion layer (P-EPI layer) 501 that is in direct contact with a second diffusion layer (P+ SUB layer) 500. The Examiner argues that *Chung's* P-EPI layer 501 is entirely separated from its P+ SUB layer 500 by N-type buried layer 505. *Office Action of 11/3/05,* page 3. However, as clearly shown in *Chung* Figure 5D, *Chung's* P-EPI layer 501 contacts its P+ SUB layer 500 along an entire interface of those two layers. That is, they are not separated at all. *Chung's* N-type buried layer 505 is formed entirely within its P-EPI layer 501, and thus does not separate the P-EPI layer 501 from the P+ SUB layer 500.

For at least this reason, *Chung* fails to disclose or suggest claim 7.

Applicants respectfully submit the rejection has been overcome and request that it be withdrawn.

CONCLUSION

In view of the foregoing, it is submitted that claim 7 is patentable. It is therefore submitted that the application is in condition for allowance. Notice to that effect is respectfully requested.

Respectfully submitted,

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